

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re WIRECARD AG SECURITIES
LITIGATION

This Document Relates To:

ALL ACTIONS.

) Civ. Action No. 2:20-cv-03326-AB

) CLASS ACTION

) LEAD PLAINTIFFS' MOTION FOR
) RECONSIDERATION OF ORDER #88
) (GRANTING MOTION TO DISMISS FOR
) LACK OF PERSONAL JURISDICTION)
) OR, IN THE ALTERNATIVE, FOR ENTRY
OF JUDGMENT PURSUANT TO FED. R.
CIV. P. 54(b)

Lead Plaintiffs Thanh Sam and Lawrence Gallagher (“Plaintiffs”) hereby move the Court to reconsider its Order (ECF 88) granting Defendant Ernst & Young GmbH Wirtschaftsprüfungsgesellschaft’s (“EY Germany”) Motion to Dismiss for Lack of Personal Jurisdiction (ECF 64). In the alternative, Plaintiffs request entry of judgment pursuant to Fed. R. Civ. P. 54(b) on Plaintiffs’ claims against EY Germany. In support of this Motion, Plaintiffs submit herewith a Memorandum of Law.

DATED: December 22, 2022

SAXTON & STUMP
LAWRENCE F. STENGEL (P.A. Bar # 32809)

s/ Lawrence F. Stengel
LAWRENCE F. STENGEL

280 Granite Run Drive, Suite 300
Lancaster, PA 17601
Telephone: 717/556-1000
717/441-3810 (fax)
lfs@saxtonstump.com

Local Counsel for Lead Plaintiffs

SEEGER WEISS LLP
CHRISTOPHER A. SEEGER
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: 212/584-0700
212/584-0799 (fax)
cseeger@seegerweiss.com

Additional Counsel for Plaintiff

ROBBINS GELLER RUDMAN
& DOWD LLP
SHAWN A. WILLIAMS
HADIYA K. DESHMUKH
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
shawnw@rgrdlaw.com
hdeshmukh@rgrdlaw.com

HAGENS BERMAN SOBOL SHAPIRO LLP
REED R. KATHREIN
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: 510/725-3000
510/725-3001 (fax)
reed@hbsslaw.com

HAGENS BERMAN SOBOL SHAPIRO LLP
STEVEN W. BERMAN
1301 Second Avenue, Suite 2000
Seattle, WA 98101
Telephone: 206/623-7292
206/623-0594 (fax)
steve@hbsslaw.com

*Lead Counsel for Lead Plaintiffs Thanh Sam and
Lawrence Gallagher*

BRONSTEIN, GEWIRTZ & GROSSMAN,
LLC
PERETZ BRONSTEIN
60 East 42nd Street, Suite 4600
New York, NY 10165
Telephone: 212/697-6484
212/697-7296 (fax)
peretz@bgandg.com

Additional Counsel for Lead Plaintiff Thanh Sam

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on December 22, 2022, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Lawrence F. Stengel

LAWRENCE F. STENGEL

SAXTON & STUMP
280 Granite Run Drive, Suite 300
Lancaster, PA 17601
Telephone: 717/556-1000
717/441-3810 (fax)
E-mail: lfs@saxtonstump.com

Mailing Information for a Case 2:20-cv-03326-AB IN RE: WIRECARD AG SECURITIES LITIGATION

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Lee Albert**
lalbert@glancylaw.com,lee-albert-5832@ecf.pacerpro.com,info@glancylaw.com
- **PERETZ BRONSTEIN**
peretz@bgandg.com
- **Vincent A. Coppola**
vcoppola@pribanic.com,gregory@pribanic.com
- **HADIYA K. DESHMUKH**
hdeshmukh@rgrdlaw.com,hdeshmukh@ecf.courtdrive.com
- **JOHN H. GEORGE**
jgeorge@rgrdlaw.com,jgeorge@ecf.courtdrive.com,smorris@ecf.courtdrive.com
- **JACOB A. GOLDBERG**
jgoldberg@rosenlegal.com,etexidor@rosenlegal.com
- **REED KATHREIN**
reed@hbsslaw.com,sf_filings@hbsslaw.com
- **JEFFREY L. KODROFF**
jkodroff@srkattorneys.com
- **WILLIAM S. NORTON**
bnorton@motleyrice.com,mhickey@motleyrice.com
- **MICHAEL J. QUIRK**
mquirk@motleyrice.com,hfonseca@motleyrice.com,lmandara@motleyrice.com
- **LAURENCE MATTHEW ROSEN**
LRosen@Rosenlegal.com
- **CHRISTOPHER A. SEEGER**
cseeger@seegerweiss.com,styjer@seegerweiss.com,seegerweiss@myecfx.com,rbarreca@seegerweiss.com,sabrina-tyjer-1389@ecf.pacerpro.com,msheridan@seegerweiss.com,DKekatos@seegerweiss.com,dsparks@seegerweiss.com,abadaruzzaman@seegerweiss.com,dion--kekatos-1017@ecf.pacerpro.com
- **LAWRENCE F. STENGEL**
lfs@saxtonstump.com,cag@saxtonstump.com,jss@saxtonstump.com
- **DAVID A. STRAITE**
dstraite@kaplanfox.com
- **Danielle Smith**
danielles@hbsslaw.com,sf_filings@hbsslaw.com
- **SHAWN A. WILLIAMS**
shawnw@rgrdlaw.com,smorris@rgrdlaw.com,e_file_sd@rgrdlaw.com,jgelman@rgrdlaw.com,shawnw@ecf.courtdrive.com,JGelman@ecf.courtdrive.com
- **WESLEY A. WONG**
wesleyw@hbsslaw.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Lucas	E Gilmore
Hagens Berman Sobol Shapiro LLP	
715 Hearst Avenue	Suite 202
Berkeley, CA 94710	